

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JOSEPH A. D'AVERSA, on behalf of himself
and all others similarly situated,

Plaintiff,

v.

J. CREW GROUP, INC.; J. CREW OPERATING
CORP.; J. CREW, INC.; J. CREW
INTERNATIONAL, INC.; CHINOS
HOLDINGS, INC.; CHINOS INTERMEDIATE
HOLDINGS A, INC.; and CHINOS
INTERMEDIATE HOLDINGS B. INC.,

Defendants.

Civil Action No. 1:16-cv-01590-DLC

**NOTICE OF MOTION TO DISMISS THE COMPLAINT
OR IN THE ALTERNATIVE TO STRIKE CLASS ALLEGATIONS**

PLEASE TAKE NOTICE that upon Plaintiff's Complaint, the accompanying Memorandum of Law in Support of J. Crew's Motion Pursuant to Fed. R. Civ. P. 12(g) to Dismiss and to Strike, and the Declarations of Anthony Anscombe and Brittany Sydnor, Defendants J. Crew Group, Inc., J. Crew Operating Corp., J. Crew, Inc., J. Crew International, Inc., Chinos Holdings, Inc., Chinos Intermediate Holdings A, Inc., and Chinos Intermediate Holdings B, Inc. (collectively, J. Crew), by and through its undersigned counsel, will move this Court, before the Honorable Denise L. Cote, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 15B, New York, New York 10007, on a date and at a time designated by the Court, for an Order, pursuant to Rules 12(b)(1), 12(b)(6), 12(f) and 23(d)(1)(D) of the Federal Rules of Civil Procedure, (a) dismissing Plaintiff's Complaint in its entirety; (b) in the alternative, striking Plaintiff's putative

nationwide class claims; and (c) for such other and further relief as this Court may deem just and proper.

DATED: April 29, 2016

SEDGWICK LLP

By: /s/
Anthony Anscombe
Stephanie Sheridan
Laurie Kamaiko

Attorneys for Defendants J. Crew Group, Inc., J. Crew Operating Corp., J. Crew, Inc., J. Crew International, Inc., Chinos Holdings, Inc., Chinos Intermediate Holdings A, Inc., and Chinos Intermediate Holdings B, Inc.

Anthony J. Anscombe (admitted *pro hac vice*)
SEDGWICK LLP
One North Wacker Drive, Suite 4200
Chicago, IL 60606-2841
anthony.anscombe@sedgwicklaw.com
tel: 312.641.9050
fax: 312.641.9530

Stephanie A. Sheridan (admitted *pro hac vice*)
SEDGWICK LLP
333 Bush Street
San Francisco, CA 94104
Stephanie.Sheridan@sedgwicklaw.com
tel: 415.781.7900
fax: 877.547.2780

Laurie Kamaiko
SEDGWICK LLP
Brookfield Place
225 Liberty Street, 28th Floor
New York, New York 10281-1008
Laurie.Kamaiko@sedgwicklaw.com
tel: 212.422.0202
fax: 877.543.9170